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SHAPIRO LAW FIRM, P.C.
Jay L. Shapiro (No. 014650)
1819 E. Morten Avenue, Suite 280
Phoenix, Arizona 85020
Telephone (602) 559-9575

LIBERTY UTILITIES
Todd C. Wiley (No. 015358)
12725 W. Indian School Road, Suite D-101
Avondale, Arizona 85392

Attorneys for Liberty Utilities (Entrada Del Oro Sewer) Corp.

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF LIBERTY UTILITIES (ENTRADA DEL
ORO SEWER) CORP., AN ARIZONA
CORPORATION, FOR AUTHORITY TO
ISSUE EVIDENCE OF INDEBTEDNESS IN
AN AMOUNT NOT TO EXCEED
\$1,750,000.

DOCKET NO: SW-04316A-16-0085

MOTION TO CONSOLIDATE

Liberty Utilities (Entrada Del Oro Sewer) Corp. ("Liberty EDO" or "Company") hereby files this Motion to Consolidate the above-captioned matter with the Application filed by Liberty EDO in Docket No. SW-04316A-16-0078. Such relief is warranted because the issues in the two dockets are inextricably linked. The Company has used the debt subject to the financing application in its capital structure in the rate application, and a capital structure with debt is more balanced than a capital structure without the debt. In addition, consolidation would result in administrative efficiency and administrative economy as only one proceeding will be necessary to decide two separate but interrelated applications.

Publication/mailing of the public notice regarding the financing application is currently due March 17, 2016. It would be preferable for the Company to send out one notice, advising Liberty EDO customers of both proceedings at the same time. Thus, the

1 Company further requests that new notice requirements be addressed if this motion to
2 consolidate is granted.

3 Based upon the foregoing, Liberty EDO asks that the Commission issue an order
4 granting the request for consolidation of its rate application with its financing application.

5 RESPECTFULLY SUBMITTED this 9th day of March, 2016.

6 SHAPIRO LAW FIRM, P.C.

7
8 By: _____

Jay L. Shapiro
1819 E. Morten Avenue, Suite 280
Phoenix, AZ 85020

10 and

11 LIBERTY UTILITIES

12 Todd C. Wiley
13 Assistant General Counsel
14 12725 W. Indian School Road, Suite D-101
Avondale, AZ 85392

15 Attorneys for Liberty Utilities
16 (Entrada Del Oro Sewer) Corp.

17 ORIGINAL and thirteen (13) copies
18 of the foregoing were delivered
this 9th day of March, 2016, to:

19 Docket Control
20 Arizona Corporation Commission
1200 W. Washington Street
21 Phoenix, AZ 85007

22 COPY of the foregoing was hand-delivered
this 9th day of March, 2016, to:

23 Sasha Paternoster, ALJ
24 Hearing Division
Arizona Corporation Commission
1200 W. Washington Street
25 Phoenix, AZ 85007
26

1 Robin Mitchell
2 Legal Division
3 Arizona Corporation Commission
4 1200 W. Washington Street
5 Phoenix, AZ 85007

6 By: Whitney Birk
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